

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

No. 4:23-cr-422

**JOE FRANK BARRERA
RAYMOND WILLIAM BURNETT
MORGAN SHANE COOPER
WILLIAM ESPINOZA
MARIO HUMBERTO GOMEZ
JOSEPH ROY GOMEZ
EDGAR MAURICIO HINOJOSA
RUDLOPH CHRISTOPHER LOPEZ
JESSE JAMES MULREIN
RICARDO QUINONES
JOE RIOS
MOISES SORIANO**

Defendants.

JOINT UNOPPOSED MOTION FOR CONTINUANCE

Comes now, Judith Shields, attorney for Mario Humberto Gomez and moves this Court to continue the deadlines established in the Court's Amended Scheduling Order (Doc. #208) and set this matter for trial in December 2025; and in support thereof would respectfully show the court the following:

1. The current order has the following deadlines:

- a. May 1, 2025– Motions deadline
 - b. May 12, 2025- Pretrial Materials
 - c. May 16, 2025 – Pretrial conference
 - d. May 19, 2025– Jury selection and trial
2. Counsel has been informed by AUSA Byron Black that there is a large amount of discovery that is still being prepared for all defendants and there is the likelihood of a superseding indictment in this case.
 3. Furthermore, Counsel will be out of state from May 12-23, 2025, for a college graduation that was scheduled before the new dates in the scheduling order.
 4. For these reasons, Judith Shields moves that all dates be continued and the new trial date be set in December 2025. Counsel for the Government has informed counsel that trial in December would work best due to conflicts with other trial settings.
 5. Counsel has received emails from all of the co-defendants and all join in the motion: Natalie Awad, counsel for Joe Frank Barrera; Edward Mallet, counsel for Raymond Burnet; Brett Podolsky, counsel for Morgan Cooper; Thomas Martin, counsel for William Espinoza; Albert Fong, counsel for Joseph Gomez; Lourdes Rodriguez, counsel for Edgar Hinojosa; Joel Bennett, counsel for Rudolph Lopez; Chikwudi Egnouonu, counsel for Jesse Mulrein; Nicole

Deborde, counsel for Ricardo Quinones; Lance Hamm, counsel for Joe Rios; and Trent Gaither, counsel for Moises Soriano.

6. The law permits a continuance under these grounds under Title 18, United States Code, section 3161(h)(7)(A) and (B)(iv), as an “ends of justice” continuance, and all parties agree that this is a properly excludable delay.

Respectfully submitted,

/s/ Judith Shields

Judith Shields
SDTX No, 424027
SBOT 00793271
Attorney for Travion Adams
10655 Six Pines, Suite 230
The Woodlands, Texas 77380
Phone: 936-703-5002
Fax: 877-900-2822
JudithShieldsAttorney@gmail.com

CERTIFICATE OF CONFERENCE

On April 24, 2025, I communicated via email with Assistant United States Attorney Byron Black about the contents of this motion. He does not oppose the granting of the motion.

/s/ Judith Shields

Judith Shields

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion was delivered to all counsel of record, on April 24, 2025, via ECF.

/s/ Judith Shields
Judith Shields